

# United States Senate

COMMITTEE ON FINANCE

WASHINGTON, DC 20510-6200

April 21, 2010

## Via Electronic Transmission

Eugene Gessow  
Division Director  
Arkansas Division of Medical Services  
State of Arkansas  
Donaghey Plaza South  
P.O. Box 1437  
Little Rock, AR 72203

Dear Division Director Gessow:

In the United States, the federal and state governments spend roughly \$317 billion every year on the Medicaid program. As Ranking Member of the Senate Committee on Finance, I have an obligation to ensure that taxpayer dollars are appropriately spent on federal health care programs. Like the Medicare program, Medicaid suffers from systemic weaknesses that lead to fraud, waste, and abuse across the program, resulting in higher costs and less health care to those who are in need. The overutilization of prescription drugs, whether through drug abuse or outright fraud, plays a significant role in the rising cost of our healthcare system. The purpose of this letter is to request information regarding certain outliers in Arkansas' Medicaid program and what steps Arkansas takes to monitor rates of utilization.

In recent inquiries, I have asked the U.S. Department of Health and Human Services about physicians prescribing mental health drugs at astonishingly high rates. In addition to these concerns, a recent CNN report detailed the increasing abuse of OxyContin, Roxicodone, and Xanax. Specifically, the report described the role some pain management clinics and physicians play in the black market for these drugs. I write today to better ascertain how high rates of both mental health and pain medication utilization are affecting the Medicaid program, as well as how Arkansas' rates compare to the national rates.

To that end, please provide charts that list of the top ten Medicaid prescribers of the following drugs for the years 2008 and 2009. For each prescriber, please provide his/her prescriber identifier, and the number of prescriptions written per drug per year, and the total amount billed to Medicaid per drug, separated for each year.

- Abilify;
- Geodon;
- Seroquel;
- Zyprexa;

- Risperdal;
- OxyContin;
- Roxicodone; and
- Xanax.

I thank you in advance for your cooperation and request that you provide the requested documents and written responses by no later than May 5, 2010. In your reply, please format information into a chart like the examples provided below. All formal correspondence should be sent electronically in PDF format to [Brian\\_Downey@finance-rep.senate.gov](mailto:Brian_Downey@finance-rep.senate.gov) or via facsimile to (202) 228-2131. Of course should you wish to discuss this matter further, please do not hesitate to contact Christopher Armstrong of my Committee staff at (202) 224-4515.

Sincerely,



Charles E. Grassley  
Ranking Member

Attachment

**Drug X, 2008**

| Prescriber Identifier | Total prescriptions | Total billed to Medicaid |
|-----------------------|---------------------|--------------------------|
| 123456789             | 25,000              | 250,000                  |
| 234567891             | 24,000              | 240,000                  |
| 345678912             | 23,000              | 230,000                  |
| 456789123             | 22,000              | 220,000                  |
| 567891234             | 21,000              | 210,000                  |
| 678912345             | 20,000              | 200,000                  |
| 789123456             | 19,000              | 190,000                  |
| 891234567             | 18,000              | 180,000                  |
| 912345678             | 17,000              | 170,000                  |
| 012345678             | 16,000              | 160,000                  |

**Drug X, 2009**

| Prescriber Identifier | Total prescriptions | Total billed to Medicaid |
|-----------------------|---------------------|--------------------------|
| 123456789             | 25,000              | 250,000                  |
| 234567891             | 24,000              | 240,000                  |
| 345678912             | 23,000              | 230,000                  |
| 456789123             | 22,000              | 220,000                  |
| 567891234             | 21,000              | 210,000                  |
| 678912345             | 20,000              | 200,000                  |
| 789123456             | 19,000              | 190,000                  |
| 891234567             | 18,000              | 180,000                  |
| 912345678             | 17,000              | 170,000                  |
| 012345678             | 16,000              | 160,000                  |



## Division of Medical Services

P.O. Box 1437, Slot S-401 · Little Rock, AR 72203-1437  
501-682-8292 · Fax: 501-682-1197 · TDD: 501-682-6789



May 4, 2010

### Via Electronic Transmission

Honorable Charles E. Grassley  
Ranking Member  
Senate Committee on Finance  
United States Senate  
219 Dirksen Senate Office Building  
Washington, DC 20510-6200

Dear Senator Grassley:

This letter is in response to your request for information dated April 21, 2010. The requested data is attached in the format you specified, which includes information based on date of payment in Calendar Years 2008 and 2009, respectively, amount paid by the Medicaid agency for the drugs, and total prescriptions for the top ten Medicaid prescribers. The total amount paid is the total amount reimbursed to the pharmacy for the dispensing of the medication in question.

Arkansas Medicaid's reimbursement for prescription drugs is based on Average Wholesale Price (AWP) minus 14% for brand name medications and AWP minus 20% for generic medications. There are state and federal upper limits on some brand name medications and their generic equivalents. In these cases, the medication is reimbursed at that upper limit.

I hope this information is helpful and responsive to your request.

Sincerely,

A handwritten signature in black ink, reading "Eugene I. Gessow". The signature is fluid and cursive.

Eugene I. Gessow  
Director

cc: Governor Mike Beebe  
Frank Scott, Deputy Director, Governor's Office  
U.S. Senator Blanche Lincoln  
U.S. Senator Mark Pryor  
U. S. Representative Vic Snyder  
U. S. Representative John Boozman  
U. S. Representative Mike Ross  
U. S. Representative Marion Berry

U.S. Senator Charles E. Grassley

May 4, 2010

Page 2

Arkansas State Senator Percy Malone, Senate Chair, Public Health, Welfare, and Labor  
Arkansas State Representative Gregg Reep, House Chair, Public Health, Welfare, and Labor  
John Selig, Director, Arkansas Department of Human Services  
Janie Huddleston, Deputy Director, Arkansas Department of Human Services  
Joseph Thompson, MD, Arkansas Surgeon General  
Scott Harper, CMS Dallas Regional Office  
David Laffoon, Director, Division of Behavioral Health Services, Arkansas Department  
of Human Services  
David Wroten, Executive Vice President, Arkansas Medical Society  
Mark Riley, Executive Vice President, Arkansas Pharmacy Association

Abilify, 2008

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1083675441            | 1,550        | \$ 963,163        |
| 1669494092            | 1,311        | \$ 719,482        |
| 1104822097            | 885          | \$ 441,666        |
| 1588692453            | 698          | \$ 286,201        |
| 1750373395            | 641          | \$ 328,594        |
| 1871546051            | 622          | \$ 349,171        |
| 1811084221            | 569          | \$ 329,861        |
| 1376568139            | 566          | \$ 281,793        |
| 1861498743            | 559          | \$ 291,557        |
| 1871500314            | 539          | \$ 273,362        |

Abilify, 2009

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1669494092            | 1,593        | \$ 886,919        |
| 1083675441            | 1,209        | \$ 698,466        |
| 1871500314            | 937          | \$ 468,547        |
| 1518098714            | 773          | \$ 443,909        |
| 1811084221            | 740          | \$ 389,902        |
| 1962465740            | 721          | \$ 360,368        |
| 1750373395            | 711          | \$ 365,515        |
| 1104822097            | 701          | \$ 351,547        |
| 1861498743            | 630          | \$ 298,052        |
| 1588692453            | 619          | \$ 258,014        |

Geodon, 2008

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1104822097            | 601          | \$ 173,701        |
| 1750373395            | 317          | \$ 128,193        |
| 1588692453            | 178          | \$ 58,781         |
| 1952368425            | 169          | \$ 65,538         |
| 1255522611            | 166          | \$ 44,078         |
| 1427144005            | 146          | \$ 56,700         |
| 1023197803            | 145          | \$ 59,312         |
| 1598737249            | 136          | \$ 69,576         |
| 1154423846            | *134         | \$ 52,756         |
| 1588748990            | *134         | \$ 41,093         |
| 1215978770            | 129          | \$ 56,243         |

\* Tie

Geodon, 2009

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1104822097            | 412          | \$ 133,837        |
| 1750373395            | 295          | \$ 129,784        |
| 1023197803            | *225         | \$ 103,246        |
| 1588692453            | *225         | \$ 68,825         |
| 1992824148            | 184          | \$ 50,979         |
| 1861498743            | 159          | \$ 59,763         |
| 1437121373            | 150          | \$ 70,901         |
| 1598737249            | 148          | \$ 72,025         |
| 1417936147            | 143          | \$ 67,691         |
| 1588748990            | 137          | \$ 48,014         |
| 1255522611            | 129          | \$ 37,218         |

\*Tie

Seroquel, 2008

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1669494092            | 879          | \$ 283,475        |
| 1952383820            | 589          | \$ 244,775        |
| 1801854195            | 509          | \$ 202,971        |
| 1811084221            | 507          | \$ 119,499        |
| 1417922261            | 483          | \$ 122,441        |
| 1477617918            | 477          | \$ 65,899         |
| 1083675441            | 475          | \$ 216,762        |
| 1730299702            | 464          | \$ 138,226        |
| 1588692453            | 423          | \$ 113,363        |
| 1871546051            | 382          | \$ 79,624         |

Seroquel, 2009

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1669494092            | 955          | \$ 302,943        |
| 1811084221            | 574          | \$ 138,352        |
| 1790846947            | 521          | \$ 150,177        |
| 1952383820            | 505          | \$ 204,834        |
| 1477617918            | 485          | \$ 80,724         |
| 1801854195            | 454          | \$ 185,702        |
| 1699713347            | 447          | \$ 143,122        |
| 1417922261            | *445         | \$ 114,681        |
| 1588692453            | *445         | \$ 134,389        |
| 1730299702            | 425          | \$ 136,529        |
| 1861498743            | 404          | \$ 135,578        |

\*Tie



Zyprexa, 2008

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1669494092            | 585          | \$ 353,692        |
| 1215978770            | 512          | \$ 435,209        |
| 1801854195            | 378          | \$ 223,293        |
| 1104822097            | 256          | \$ 227,803        |
| 1417936147            | 229          | \$ 137,360        |
| 1255522611            | 219          | \$ 84,135         |
| 1083675441            | 205          | \$ 208,784        |
| 1770651408            | 177          | \$ 106,384        |
| 1659324291            | 171          | \$ 137,859        |
| 1508835646            | 170          | \$ 96,859         |

Zyprexa, 2009

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1669494092            | 442          | \$ 313,731        |
| 1215978770            | 385          | \$ 319,905        |
| 1194824771            | 327          | \$ 177,267        |
| 1801854195            | 319          | \$ 209,738        |
| 1861498743            | 201          | \$ 139,145        |
| 1104822097            | 200          | \$ 188,172        |
| 1417936147            | 187          | \$ 103,050        |
| 1770651408            | 177          | \$ 121,661        |
| 1245290816            | 174          | \$ 157,073        |
| 1659324291            | 167          | \$ 157,811        |

Risperdal (includes generic products), 2008

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1700923208            | 1,408        | \$ 403,463        |
| 1801854195            | 1,211        | \$ 418,300        |
| 1003881848            | 1,025        | \$ 236,684        |
| 1811084221            | 924          | \$ 212,990        |
| 1669494092            | 887          | \$ 322,036        |
| 1104822097            | 811          | \$ 417,999        |
| 1417922261            | 647          | \$ 158,968        |
| 1508835646            | 594          | \$ 254,055        |
| 1194824771            | 586          | \$ 233,615        |
| 1902878473            | 581          | \$ 148,548        |

Risperdal (includes generic products), 2009

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1801854195            | 1,302        | \$ 219,228        |
| 1801978333            | 988          | \$ 71,616         |
| 1962465740            | 949          | \$ 65,948         |
| 1194824771            | 914          | \$ 305,676        |
| 1811084221            | 882          | \$ 70,174         |
| 1669494092            | 861          | \$ 152,461        |
| 1104822097            | 797          | \$ 324,948        |
| 1003881848            | 770          | \$ 56,420         |
| 1700923208            | 714          | \$ 60,116         |
| 1023086931            | 623          | \$ 48,831         |

OxyContin (includes generic products), 2008

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1255327763            | 99           | \$ 36,528         |
| 1477643955            | 71           | \$ 16,002         |
| 1831289313            | 40           | \$ 7,531          |
| 1568552040            | 35           | \$ 6,472          |
| 1407814270            | 32           | \$ 2,713          |
| 1356312466            | 24           | \$ 6,011          |
| 1417963620            | *17          | \$ 2,734          |
| 1659461135            | *17          | \$ 5,209          |
| 1548268592            | *17          | \$ 2,207          |
| 1730166844            | *17          | \$ 2,803          |
| 1437115508            | *15          | \$ 2,883          |
| 1053446047            | *15          | \$ 2,882          |
| 1033180229            | *14          | \$ 7,394          |
| 1407877947            | *14          | \$ 7,981          |
| 1104897009            | *13          | \$ 3,034          |
| 1306814470            | *13          | \$ 5,805          |

\*Tie(s)

OxyContin (includes generic products), 2009

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1477643955            | 106          | \$ 27,400         |
| 1104897099            | 47           | \$ 16,012         |
| 1831289313            | 39           | \$ 8,354          |
| 1568552040            | *32          | \$ 4,978          |
| 1205923471            | *32          | \$ 16,216         |
| 1083685283            | 31           | \$ 11,030         |
| 1861582330            | 29           | \$ 11,804         |
| 1356312466            | *19          | \$ 6,459          |
| 1538168505            | *19          | \$ 4,256          |
| 1083704563            | 18           | \$ 3,218          |
| 1558460626            | *17          | \$ 2,823          |
| 1467671792            | *17          | \$ 8,252          |
| 1184674608            | *15          | \$ 3,601          |
| 1891834016            | *15          | \$ 6,180          |

\*Tie(s)

Roxicodone (includes generic products), 2008

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1538137500            | 396          | \$ 61,717         |
| 1366620833            | 257          | \$ 27,743         |
| 1891772786            | 229          | \$ 35,697         |
| 1508915166            | 178          | \$ 21,242         |
| 1043300601            | 89           | \$ 926            |
| 1326049255            | 88           | \$ 6,904          |
| 1033195649            | 85           | \$ 4,587          |
| 1770581845            | *65          | \$ 8,100          |
| 1245228543            | *65          | \$ 5,090          |
| 1205055530            | 59           | \$ 611            |
| 1942208434            | 55           | \$ 6,108          |

\*Tie

Roxicodone (includes generic products), 2009

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1538137500            | 467          | \$ 79,840         |
| 1366620833            | 425          | \$ 46,396         |
| 1891772786            | 197          | \$ 29,867         |
| 1043300601            | 120          | \$ 1,376          |
| 1326049255            | 114          | \$ 9,532          |
| 1508915166            | 111          | \$ 14,464         |
| 1770581845            | 108          | \$ 12,566         |
| 1992924229            | 92           | \$ 1,310          |
| 1033195649            | *91          | \$ 5,778          |
| 1063441699            | *91          | \$ 8,040          |
| 1265438782            | 83           | \$ 4,574          |

\*Tie

Xanax (includes generic products), 2008

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1134282999            | 2,156        | \$ 27,124         |
| 1023197803            | 1,986        | \$ 38,208         |
| 1093797292            | 1,033        | \$ 10,400         |
| 1467448837            | 985          | \$ 11,339         |
| 1528257003            | 726          | \$ 8,964          |
| 1669575569            | 626          | \$ 6,255          |
| 1265438782            | 603          | \$ 8,304          |
| 1538137500            | 563          | \$ 10,987         |
| 1902885015            | 514          | \$ 6,410          |
| 1700923208            | 484          | \$ 9,441          |

Xanax (includes generic products), 2009

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1023197803            | 2,229        | \$ 42,821         |
| 1093797292            | 857          | \$ 7,380          |
| 1528257003            | 819          | \$ 8,716          |
| 1467448837            | 792          | \$ 9,313          |
| 1538137500            | 718          | \$ 13,524         |
| 1265438782            | 614          | \$ 7,818          |
| 1669575569            | 598          | \$ 5,968          |
| 1811963325            | 589          | \$ 5,394          |
| 1700923208            | 571          | \$ 11,677         |
| 1902885015            | 554          | \$ 6,656          |



## Division of Medical Services

P.O. Box 1437, Slot S-401 · Little Rock, AR 72203-1437  
501-682-8292 · Fax: 501-682-1197 · TDD: 501-682-6789



May 10, 2010

Dear

In the enclosed letter dated April 21, 2010 from U.S. Senator Charles Grassley, Arkansas Medicaid, as well as all State Medicaid agencies, was asked to provide the requested information on the top ten prescribers for each of those drugs listed.

In compliance with this Congressional request, Arkansas Medicaid has sent the enclosed letter to U.S. Senator Charles Grassley. As a courtesy to you, we wanted to let you know that you are among those top 10 prescribers. We did not personally identify any of the prescribers, but rather listed them by NPI number.

We appreciate your willingness to provide services to the State's Medicaid beneficiaries.

Sincerely,

A handwritten signature in black ink, reading "Eugene I. Gessow".

Eugene I. Gessow  
Director

Enclosures

PATRICK J. LEAHY, VERMONT, CHAIRMAN

HERB KOHL, WISCONSIN  
DIANNE FEINSTEIN, CALIFORNIA  
CHARLES E. SCHUMER, NEW YORK  
RICHARD J. DURBIN, ILLINOIS  
SHELDON WHITEHOUSE, RHODE ISLAND  
AMY KLOBUCHAR, MINNESOTA  
AL FRANKEN, MINNESOTA  
CHRISTOPHER A. COONS, DELAWARE  
RICHARD BLUMENTHAL, CONNECTICUT

CHARLES E. GRASSLEY, IOWA  
ORRIN G. HATCH, UTAH  
JON KYL, ARIZONA  
JEFF SESSIONS, ALABAMA  
LINDSEY O. GRAHAM, SOUTH CAROLINA  
JOHN CORNYN, TEXAS  
MICHAEL S. LEE, UTAH  
TOM COBURN, OKLAHOMA

**United States Senate**

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

BRUCE A. COHEN, *Chief Counsel and Staff Director*  
KOLAN L. DAVIS, *Republican Chief Counsel and Staff Director*

January 23, 2012

**VIA ELECTRONIC TRANSMISSION**

Marilyn Strickland  
Interim Director, Division of Medical Services  
Arkansas Department of Human Services  
P.O. Box 1437, Slot S-401  
Little Rock, AR 72203-1437

Dear Interim Director Strickland:

On May 4, 2010, the Arkansas Department of Human Services provided my office with data regarding the top ten prescribers of several pain management and mental health drugs in your state. These types of drugs have addictive properties, and the potential for fraud and abuse by prescribers and patients is extremely high. Mental health drugs continue to be prescribed at astounding rates and pain management clinics are turning into a hotbed for black market painkillers. When these drugs are prescribed to Medicaid patients, it is the American people who pay the price for over-prescription, abuse, and fraud.

After an extensive review of prescribing habits of the serial prescribers of pain and mental health drugs in Arkansas, I have concerns about the oversight and enforcement of Medicaid abuse in your state. While I am sensitive to concerns about the potential for misinterpretation of the data you provided, the numbers themselves are quite shocking.

For example, the top two prescribers of Roxicodone and its generic equivalents in 2009 wrote 892 prescriptions for the drug—nearly as much as the remainder of the

top ten list combined. Similarly, the top prescriber for OxyContin prescribed five times the amount as prescribers as the bottom of the list. These outliers are consistent with several of the antipsychotic drugs as well—with the top prescribers writing double or triple the number of prescriptions as the other prescribers on the list.

It is my intention to ensure that each of the states is adequately monitoring, investigating, and stopping fraud and over-prescription of these types of drugs. Therefore, please provide answers to the following questions:

1. What action, if any, has your agency taken with respect to the prescribers identified to the Committee?
2. If there has been no action taken with respect to these prescribers, please explain why not.
3. Please identify which of the providers identified to the Committee remain eligible to bill the Medicaid Program.
4. Please provide the 2010 and 2011 numbers for the top prescribers of these same drugs.
5. Has each of these prescribers been cross-checked for complaints or misconduct with the state medical board or the National Practitioner Data Bank? If not, do you plan to do so?
6. Have any of the prescribers identified to this Committee been referred to your state medical board?
7. Is there any system set up in your state to identify and monitor excessive prescription writing? If not, why not?
8. Have you received any training or guidance from the Centers for Medicare and Medicaid Studies to help identify potential issues with prescription drugs?
9. Does your state maintain a database of all prescribed controlled-substances? If so, what entities have access to it?
10. Does your state have any point-of-sale restrictions related to maximum units, prior authorization, therapeutic duplication, or early refill? If not, why not?
11. Were any of these top ten prescribers identified in the federal-mandated Drug Utilization Review or CMS-base retrospective reviews?
12. Does your state have any programs in place to educate providers about the prescription of antipsychotics to children and adolescents?



Thank you in advance for your cooperation and attention in this matter. When responding to this letter, please number your answers in accordance with my questions. I would appreciate a response by February 13, 2012. If you have any questions, please do not hesitate to contact Erika Smith of my staff at (202) 224-5225.

Sincerely,

A handwritten signature in blue ink that reads "Chuck Grassley". The signature is written in a cursive, flowing style.

Charles E. Grassley  
Ranking Member  
Committee on the Judiciary



# Arkansas Department of Human Services

## Division of Medical Services



P.O. Box 1437, Slot S-401  
Little Rock, AR 72203-1437

Fax: 501-682-1197

TDD: 501-682-6789

Internet Website: [www.medicaid.state.ar.us](http://www.medicaid.state.ar.us)

February --, 2012

Charles E. Grassley  
United States Senate  
Ranking Member  
Committee on the Judiciary  
Washington, DC 20510-6275

Dear Senator Grassley:

This letter is in response to your request for information dated January 23, 2012. The requested responses are included in the attached document along with the total claims for the top10 prescribers in calendar year 2010 and 2011 of Abilify, Geodon, Seroquel, Zyprexa, Risperdal, Oxycontin, Roxicodone and Xanax as well as their generic equivalents.

I hope this information is responsive to your request.

Sincerely,

Andy Allison  
Director

cc'd:

Mike Beebe, Arkansas Governor  
Jennifer Finn, Governor's Office  
Sen. John Boozman  
Sen. Mark Pryor  
Rep. Tim Griffin  
Rep. Steve Womack  
Rep. Mike Ross  
Rep. Rick Crawford  
John Selig, Director, ADHS  
Janie Huddleston, Deputy Director, ADHS

Joseph Thompson, Arkansas Surgeon General

Tamara Sampson, CMS

Jennifer Gallaher, DBHS

1. What action, if any, has your agency taken with respect to the prescribers identified to the Committee?

Efforts to address appropriate prescribing of atypical antipsychotic agents (e.g., Geodon®, Seroquel, Abilify®, Zyprexa®, Risperdal®), opioid drugs (e.g., OxyContin®, and Roxicodone®), and benzodiazepine (e.g., Xanax®) have been accomplished through establishing clear policies for improved patient safety and appropriate prescribing by all prescribers. These policies are described in answers to subsequent questions below. The state's focus, to date has been on educating the provider through clinical criteria and quantity limits and DUR rather than targeting specific prescribers for sanction. Nevertheless, over half of the top ten prescribers have received letters from the states Drug Utilization Review Process.

The state's efforts have had a significant impact. Over the last two years since the new policies and educational process have been in place the Medicaid program has seen a 78.6% decrease in antipsychotic claims for children less than 5 years of age and a 10.7% drop in claims for beneficiaries under 18 years of age in the past two years.

2. If there has been no action taken with respect to these prescribers, please explain why not.

Please refer to responses above.

3. Please identify which of the providers identified to the Committee remain eligible to bill the Medicaid Program.

One of the physicians included in the list of prescribers is deceased and four other physicians are no longer enrolled.

4. Please provide the 2010 and 2011 numbers for the top prescribers of these same drugs.

Abilify, 2010

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
|-----------------------|--------------|-------------------|

Abilify, 2011

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
|-----------------------|--------------|-------------------|

|            |       |    |         |
|------------|-------|----|---------|
| 1669494092 | 1,162 | \$ | 568,954 |
| 1083675441 | 1,076 | \$ | 572,379 |
| 1588692453 | 877   | \$ | 415,138 |
| 1104822097 | 675   | \$ | 328,404 |
| 1750373395 | 550   | \$ | 298,930 |
| 1659324291 | 538   | \$ | 326,011 |
| 1427144005 | 536   | \$ | 218,048 |
| 1003881848 | 529   | \$ | 230,498 |
| 1952383820 | 490   | \$ | 287,885 |
| 1811084221 | 481   | \$ | 224,857 |

|            |     |    |         |
|------------|-----|----|---------|
| 1588692453 | 893 | \$ | 496,728 |
| 1669494092 | 825 | \$ | 429,772 |
| 1104822097 | 738 | \$ | 401,561 |
| 1679796403 | 684 | \$ | 348,459 |
| 1083675441 | 665 | \$ | 388,782 |
| 1518098714 | 553 | \$ | 316,477 |
| 1013960707 | 531 | \$ | 339,391 |
| 1952383820 | 481 | \$ | 294,944 |
| 1255522611 | 477 | \$ | 269,003 |
| 1750373395 | 446 | \$ | 252,986 |

#### Geodon, 2010

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1750373395            | 326          | \$ 156,170        |
| 1134212947            | 281          | \$ 77,144         |
| 1588692453            | 278          | \$ 95,415         |
| 1104822097            | 275          | \$ 111,658        |
| 1417936147            | 170          | \$ 86,635         |
| 1023197803            | 166          | \$ 81,600         |
| 1437121373            | 164          | \$ 92,175         |
| 1992824148            | 142          | \$ 41,204         |
| 1063515948            | 137          | \$ 69,663         |
| 1255522611            | 130          | \$ 40,820         |

#### Geodon, 2011

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1750373395            | 329          | \$ 165,828        |
| 1104822097            | 306          | \$ 124,391        |
| 1588692453            | 199          | \$ 84,966         |
| 1023197803            | 153          | \$ 76,732         |
| 1134212947            | 152          | \$ 52,233         |
| 1477617918            | 136          | \$ 62,033         |
| 1255522611            | 129          | \$ 40,854         |
| 1427144005            | 123          | \$ 48,377         |
| 1417936147            | 121          | \$ 61,174         |
| 1063515948            | 117          | \$ 60,964         |

Seroquel, 2010

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1902878473            | 868          | \$ 275,174        |
| 1669494092            | 666          | \$ 259,469        |
| 1104822097            | 578          | \$ 200,073        |
| 1083675441            | 557          | \$ 232,214        |
| 1588692453            | 532          | \$ 172,949        |
| 1790846947            | 511          | \$ 189,267        |
| 1194824771            | 469          | \$ 197,523        |
| 1477617918            | 438          | \$ 89,114         |
| 1952383820            | 434          | \$ 195,076        |
| 1417922261            | 413          | \$ 120,306        |

Seroquel, 2011

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1902878473            | 709          | \$ 281,081        |
| 1477617918            | 473          | \$ 130,783        |
| 1083675441            | 458          | \$ 215,517        |
| 1962465740            | 438          | \$ 152,280        |
| 1588692453            | 373          | \$ 144,113        |
| 1215978770            | 361          | \$ 244,803        |
| 1194753046            | 358          | \$ 181,571        |
| 1255522611            | 346          | \$ 114,835        |
| 1770501637            | *323         | \$ 154,531        |
| 1104822097            | *323         | \$ 137,376        |
| 1790846947            | 318          | \$ 111,596        |

\*Tie

Zyprexa, 2010

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1215978770            | 423          | \$ 371,097        |
| 1669494092            | 340          | \$ 268,782        |
| 1194824771            | 310          | \$ 198,789        |
| 1770651408            | 217          | \$ 162,575        |
| 1790846947            | 169          | \$ 15,572         |
| 1417936147            | 160          | \$ 116,143        |
| 1801854195            | 148          | \$ 101,479        |
| 1801042247            | 143          | \$ 107,094        |
| 1508835646            | 142          | \$ 118,258        |
| 1427013846            | 138          | \$ 61,737         |

Zyprexa (includes generic products), 2011

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1215978770            | 276          | \$ 255,946        |
| 1790846947            | 206          | \$ 9,331          |
| 1770651408            | 184          | \$ 168,938        |
| 1508835646            | 179          | \$ 172,724        |
| 1245290816            | 156          | \$ 158,818        |
| 1801042247            | 150          | \$ 160,964        |
| 1073582748            | *146         | \$ 126,617        |
| 1437300712            | *146         | \$ 147,557        |
| 1053328955            | *146         | \$ 83,514         |
| 1275558918            | 130          | \$ 72,709         |
| 1669494092            | 128          | \$ 113,982        |
| 1881803203            | 127          | \$ 123,950        |

\*Tie

Risperdal (includes generic products), 2010

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1902878473            | 1,390        | \$ 73,000         |
| 1962465740            | 1,122        | \$ 37,013         |
| 1801854195            | 1,011        | \$ 71,719         |
| 1811084221            | 1,005        | \$ 40,949         |
| 1801978333            | 787          | \$ 32,991         |
| 1003881848            | 760          | \$ 28,975         |
| 1194824771            | 740          | \$ 254,824        |
| 1669494092            | 722          | \$ 70,820         |
| 1023086931            | 670          | \$ 38,478         |
| 1417922261            | 589          | \$ 35,971         |

Risperdal (includes generic products), 2011

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1902878473            | 1,781        | \$ 54,559         |
| 1962465740            | 1,200        | \$ 31,785         |
| 1811084221            | 999          | \$ 31,270         |
| 1003881848            | 952          | \$ 26,497         |
| 1801854195            | 700          | \$ 39,685         |
| 1477617918            | 628          | \$ 21,872         |
| 1104822097            | 616          | \$ 117,502        |
| 1225261282            | 573          | \$ 44,840         |
| 1083675441            | 545          | \$ 18,070         |
| 1801042247            | 528          | \$ 89,111         |

OxyContin (includes generic products), 2010

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1477643955            | 52           | \$ 15,011         |
| 1861582330            | 50           | \$ 24,828         |
| 1710935762            | 38           | \$ 12,053         |
| 1346472669            | 35           | \$ 5,089          |
| 1205923471            | 33           | \$ 20,811         |
| 1053426304            | 30           | \$ 7,188          |
| 1083685283            | 29           | \$ 17,539         |
| 1760478903            | 26           | \$ 8,348          |
| 1467671792            | 25           | \$ 16,865         |
| 1568552040            | 23           | \$ 4,621          |

OxyContin (includes generic products), 2011

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1477643955            | 39           | \$ 17,282         |
| 1205923471            | 35           | \$ 25,509         |
| 1346472669            | 33           | \$ 6,005          |
| 1861582330            | 32           | \$ 15,723         |
| 1053426304            | 29           | \$ 5,234          |
| 1558362921            | 27           | \$ 6,436          |
| 1760478903            | 25           | \$ 7,616          |
| 1083685283            | 24           | \$ 24,489         |
| 1417969478            | 22           | \$ 1,427          |
| 1255327763            | 21           | \$ 6,285          |

Roxicodone (includes generic products), 2010

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1730252289            | 452          | \$ 33,420         |
| 1366620833            | 340          | \$ 24,133         |
| 1538137500            | 222          | \$ 20,662         |
| 1326049255            | 187          | \$ 9,637          |
| 1043300601            | 153          | \$ 1,709          |
| 1891772786            | 127          | \$ 10,769         |
| 1770581845            | 116          | \$ 9,351          |
| 1811090848            | *109         | \$ 7,380          |
| 1326028440            | *109         | \$ 6,576          |
| 1033195649            | 108          | \$ 7,549          |
| 1346208527            | 94           | \$ 6,069          |

\*Tie

Roxicodone (includes generic products), 2011

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1730252289            | 855          | \$ 69,635         |
| 1326049255            | 192          | \$ 8,234          |
| 1518014729            | 184          | \$ 14,477         |
| 1811090848            | 164          | \$ 8,839          |
| 1043300601            | 136          | \$ 1,622          |
| 1346208527            | 127          | \$ 5,754          |
| 1689682353            | 122          | \$ 6,737          |
| 1326028440            | 110          | \$ 5,592          |
| 1770581845            | 101          | \$ 6,618          |
| 1033195649            | 98           | \$ 3,859          |

Xanax (includes generic products), 2010

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1023197803            | 2,107        | \$ 41,291         |
| 1588692453            | 789          | \$ 10,985         |
| 1467448837            | 774          | \$ 8,712          |
| 1528257003            | 717          | \$ 7,954          |
| 1134282999            | 688          | \$ 8,090          |
| 1902885015            | 671          | \$ 8,037          |
| 1093797292            | 605          | \$ 4,735          |
| 1154423846            | 582          | \$ 7,664          |
| 1669575569            | 559          | \$ 7,810          |
| 1407810641            | 544          | \$ 6,336          |

Xanax (includes generic products), 2011

| Perscriber Identifier | Total Claims | Total Paid Amount |
|-----------------------|--------------|-------------------|
| 1023197803            | 1,713        | \$ 31,124         |
| 1164482592            | 1,309        | \$ 12,532         |
| 1902885015            | 853          | \$ 10,319         |
| 1407810641            | 840          | \$ 10,264         |
| 1588692453            | 733          | \$ 10,078         |
| 1225036817            | 701          | \$ 8,766          |
| 1790749943            | 694          | \$ 7,765          |
| 1134282999            | 671          | \$ 8,137          |
| 1730252289            | 644          | \$ 8,360          |
| 1467448837            | 622          | \$ 7,089          |

5. Has each of these prescribers been cross-checked for complaints or misconduct with the state medical board or the National Practitioner Data Bank? If not, do you plan to do so?  
The Medicaid Pharmacy Program has not initiated such a cross-check, and does not currently have plans to do so.
6. Have any of the prescribers identified to this Committee been referred to your state medical board?



One of the prescribers had his medical license revoked for a brief period of time by the Medical Board but this was not due to a referral by Arkansas Medicaid.

7. Is there any system set up in your state to identify and monitor excessive prescription writing? If not, why not?  
Please refer to #9.
8. Have you received any training or guidance from the Centers for Medicare and Medicaid Studies to help identify potential issues with prescription drugs?  
No.
9. Does your state maintain a database of all prescribed controlled-substances? If so, what entities have access to it?

On March 17, 2011 Governor Mike Beebe signed bill SB345, the Prescription Drug Monitoring Program, into law. It will become operational by March 1, 2013 as long as funding is secured. This system will include all controlled medication prescriptions dispensed for Arkansas residents. The law stipulates that providers (physicians and pharmacists) and law enforcement will have access to the system. The Department of Health will be responsible for reviewing the information to identify misuse and abuse patterns and will contact practitioners and dispensers as related to the person identified.

10. Does your state have any point-of-sale restrictions related to maximum units, prior authorization, therapeutic duplication, or early refill? If not, why not?
  - a) Antipsychotic medications
    - i. 2009 – manual review introduced for all children <5 years of age; quantity limits and therapeutic duplication edits; quantity limits and therapeutic duplication edits were added for children < 18 years of age
    - ii. 2011 – changed manual review for children to <6 years of age; require metabolic labs and informed consent for <18yo
  - b) Opioids
    - i. 2005 – criteria was added to transmucosal fentanyl products to only allow them to pay at point of sale for recipients with a malignant cancer diagnosis
    - ii. 2008 – quantity edits were added to solid, oral short-acting opioids to allow up to 6 units per day; quantity edits were added to long-acting opioids to limit the lower strength quantities through dose optimization; edits were added to allow only one short-acting opioid and one long-acting opioid prescription at one time (therapeutic duplication); an edit was added to reject opioid claims with history of Subutex or Suboxone paid claims history
    - iii. 2009 – an edit was added to require a manual review of all solid, oral short-acting opioids for recipients <6 years of age; tramadol was added to the list of short-acting opioids for therapeutic duplication editing

- iv. 2011 - injectable and nasal spray opioid formulations were added to the short-acting opioid therapeutic duplication list; daily and monthly quantity limits were also added on these formulations
- c) Benzodiazepines
  - i. 2010 - quantity edits on solid, oral benzodiazepines were added to allow for 124 units per the previous 31 calendar days (four units per day) among all benzodiazepine prescriptions  
The quantity limits on the benzodiazepine drug class have successfully trended the vast majority of the high daily doses downward showing a dramatic decrease in the number of beneficiaries who exceed the quantity limit. For those beneficiaries who do require higher doses than the edits allow, for example those beneficiaries who are on certain benzodiazepines for seizure control, PA's have been entered on a month-to-month basis, working with the physicians as the physicians try to titrate the daily dose downward while switching to other medications.
- d) ADD/ADHD
  - i. 2003 – an edit was added to require a manual review for all requests for recipients <5 years of age
  - ii. 2006 – quantity edits and therapeutic duplication edits were added
  - iii. 2011 – an edit was required for manual review for requests for ADD/ADHD medications for recipients >18 years of age; a 6 month post edit review showed a decrease of adult use by 42%.

The early refill policy on controlled drugs was implemented on November 1, 2003 and requires the requesting pharmacist to fax a copy of the original prescription in history and a copy of the new prescription to document the prescriber has increased the dose. Each request is manually reviewed before the request is approved or denied. The early refill policy for non-controlled drugs allows pharmacists to override and refill the prescription after 75% of the days' supply has elapsed.

11. Were any of these top ten prescribers identified in the federal-mandated Drug Utilization Review or CMS-base retrospective reviews?

55% of the top 10 providers received letters from RDUR pertaining to those drugs.

12. Does your state have any programs in place to educate providers about the prescription of antipsychotics to children and adolescents?

Yes, in addition to clinical system edits and the requirement for informed consent and metabolic lab testing for antipsychotic in children less than 18 years of age, the RDUR has criteria which pertains to the antipsychotic class and educational intervention letters are mailed to providers as appropriate. RDUR educational

newsletters have also been sent to providers regarding the antipsychotic drugs. In addition, Arkansas Medicaid contracts with the Arkansas Foundation for Medical Care (AFMC), the Arkansas Quality Improvement Organization, for Quality Improvement and Provider Relations. As one of our quality improvement activities, AFMC is educating prescribers of antipsychotics about the need for the informed consent and metabolic lab testing prior to prescribing and the required process for Medicaid coverage.